

City of Lynn, Massachusetts

HOME-ARP Allocation Plan

DRAFT FOR PUBLIC COMMENT

September 2022

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I. Introduction

The City of Lynn, Massachusetts is eligible to receive \$3,347,845 in HOME American Rescue Plan (HOME-ARP) funds from the U.S. Department of Housing & Urban Development (HUD) subject to HUD approval of a HOME-ARP Allocation Plan. HOME-ARP funding addresses the need for homelessness assistance and supportive services targeted to "qualifying populations", which are individuals or families that are:

- 1. Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11302(a)) ("McKinney-Vento");
- 2. At risk of homelessness, as defined in section 401 of McKinney-Vento;
- 3. Fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking;
- 4. Part of other populations where providing supportive services or assistance would prevent a family's homelessness or would serve those with the greatest risk of housing instability; or
- 5. Veterans and families that include a veteran family member that meet the criteria in one of 1-4 above.

HOME-ARP funds must be used primarily to benefit the qualifying populations through four eligible activities: 1) Tenant-based rental assistance (TBRA); 2) Development and support of affordable housing; 3) Provision of supportive services; and 4) Acquisition and development of non-congregate shelter (NCS) units.

HUD's requirements for the HOME-ARP program are defined in HUD Notice CPD-21-10. As required under this Notice, the City of Lynn's HOME-ARP Allocation Plan incorporates information on the planning process, including citizen participation and community consultations; an analysis of needs and gaps in housing and supportive services for HOME-ARP qualifying populations; and, the planned uses of HOME-ARP funds. Developed through a collaborative consultation process, the HOME-ARP Allocation Plan is consistent with the strategic goals identified during the City's Consolidated Plan process for the federal fiscal years 2020-2024.

As described herein, the housing and supportive service needs of qualifying populations within the City of Lynn are enormous and vastly exceed the level of funding provided through HOME-ARP. Accordingly, this HOME-ARP Allocation Plan identifies priorities for use of this limited, but critically needed funding, based on community consultations and an analysis of existing needs and resources.

II. Consultation

A. Consultation process

Summarize the consultation process including methods used and dates of consultations.

This HOME-ARP Allocation Plan was developed through a collaborative process involving participation by Lynn residents and community stakeholders including non-profit and public agencies that work directly with individuals and families in the qualifying population groups. As noted in Table 1, the consultation process included the Lynn Continuum of Care (CoC); homeless service providers; domestic violence service providers; veterans' groups; the City's Public Housing Authority; public agencies that address the needs of the qualifying populations; public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities; and, other agencies whose clientele includes HOME-ARP qualifying populations. To ensure the health and safety of all participants, meetings were held virtually to facilitate community consultation. This comprehensive community engagement and consultation effort included community forums; a meeting and consultations with the Lynn Continuum of Care (CoC); public hearings; discussion meetings; correspondence via telephone and email; and a survey of service providers and the Lynn community. The consultation initiatives and engagement of participating stakeholders, along with a review of available data, helped inform the Allocation Plan process and the HOME-ARP funding priorities described below.

The City of Lynn's Department of Community Development (DCD) and the Lynn Housing Authority and Neighborhood Development (LHAND) facilitated the consultation process, which included the following activities:

Lynn Continuum of Care (CoC) Meeting

On June 16, 2022, the Lynn CoC hosted its Annual Meeting, during which the members where given an opportunity to voice their opinions about the needs of the homeless in Lynn and how the City's HOME-ARP funds should be utilized to provide housing and services for qualifying populations.

Thirty-eight CoC agency representatives participated in the CoC meeting and expressed a strong need for additional affordable housing and a wide range of supportive services. Agency representatives discussed the work they are doing to eliminate homelessness and provide housing and services for homeless, at-risk and other qualifying populations. Participants expressed the need to work together towards the goal of eliminating homelessness. A summary of the feedback received from consultation with the CoC is included in Section C.

DCD and LHAND also invited the CoC members to participate in community forums to discuss the HOME-ARP Allocation Plan process, identify potential sources of data and solicit the CoC's involvement in informing decisions regarding the use of funding. The CoC and individual member agencies provided data used to identify priority needs and gaps in service delivery for HOME-ARP qualifying populations.

Community Forums

As part of the HOME-ARP Allocation planning process, more than 250 individuals, representing 85 agencies, were invited to participate in two virtual community forums, which were held on June 15 and

June 16, 2022. This included public services agencies serving the Lynn community that provide: housing; services for children, elderly persons, persons with disabilities, persons with HID/AIDS, victims of domestic abuse, homeless persons, minorities and immigrant groups; health, education, employment, and fair housing services; and other services as well as City representatives and elected officials. Information about the forums was also publicized on agency websites, through social media outlets and in the Mayor's Newsletter.

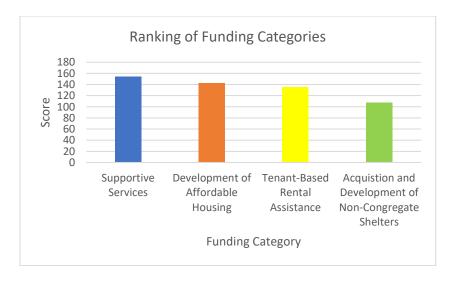
The forums engaged the community through an introductory presentation on the HOME-ARP Program including funding amounts, qualifying populations and eligible activities followed by an open discussion in which participants were asked to provide their opinions on: what they consider the unmet needs and gaps in housing and/or services for qualifying populations; information on projects that may benefit from HOME-ARP funding; and, priority needs of the target populations.

Thirty-five individuals participated in the community forums during which interpretation services were available. Information gleaned from these meetings was used to develop the HOME-ARP Allocation Plan funding priorities. Among the issues emphasized by participants during these meetings were the need for rental assistance, affordable permanent supportive housing, including accessible units for the elderly and disabled, and supportive services that include healthcare, case management and other supportive services. A summary of feedback received at the community forums is included in Section C below.

HOME-ARP Survey

Further outreach was conducted through administration of a HOME-ARP Survey. The survey polled respondents about their priorities for the allocation of the City's HOME-ARP funds and solicited information on unmet housing and service needs for the target population, as well as ideas for potential projects for funding. In an effort to reach as many citizens as possible, the survey was administered in English and Spanish and was available on-line. Sixty-six survey responses were collected. Survey results include the following:

Survey respondents identified development of affordable rental housing, tenant-based rental assistance and supportive services as the top funding priorities.



Survey respondents identified the following unmet needs:

- Rental assistance.
- Affordable units, including housing for pregnant women and persons with problematic immigration status, and first floor units for those with mobility problems.
- Shelter for young adults separate from the adult shelter and maternity shelters.
- Lack of shelter space, especially for childless adults.
- Accessible supportive services including housing search, mental health services, food resources, childcare, and advocacy services.
- Access to information in languages other than English.
- Supportive services for domestic abuse survivors and persons that do not speak English.

The following ideas for funding projects were expressed by survey respondents:

Supportive Services

- Connect tenants with rights advocates, childcare services, and job training opportunities.
- Provide help with basic activities, such as paying bills, cleaning and organizing, early intervention for mental and other health issues.
- On-site case managers and service access.
- Recovery coaches to help support clients.
- Development of Affordable Housing
 - Provide affordable housing, especially housing that is accessible and housing of different sizes.
 - Establish a land bank to develop new affordable housing of varying unit sizes.
 - o Work with non-profits or CDCs to acquire property that will remain affordable.
 - Rehab vacated buildings in the City to provide low threshold housing with supportive services that accepts those with CORIs.
 - Require a minimum of affordable units in new buildings.
- Tenant-Based Rental Assistance (TBRA)
 - TBRA should be significant enough and last long enough for people to sustain a meaningful tenancy.
 - Make funds available regardless of immigration status and shorten the application process.
 - Provide grants to landlords to keep rents affordable.
- Acquisition and Development of Non-Congregate Shelters
 - Use existing unused buildings for shelter.
 - Develop additional shelter beds; provide individual rooms for shelter occupants.
 - o Improve conditions in the shelter; include more amenities.
 - Add surge capacity, i.e. when the weather is bad.

Informational Flyer

To inform citizens about the community forums and HOME-ARP survey, a flyer (in English and Spanish) was distributed to more than 250 individuals representing 85 agencies and organizations including those serving one or more of the qualifying populations, including members of the CoC and other housing and service organizations, and posted on social media and the City and LHAND's websites. The public service agencies that were contacted are included in Table 1. The flyer provided details about the outreach efforts and the link for the on-line survey. Community groups were asked to alert their clients/members that community forums would be taking place and a HOME-ARP Survey administered as part of the Allocation

Plan process. Information about the survey was also publicized on agency websites, through social media outlets and in the Mayor's Newsletter.

B. List the organizations consulted

The City conducted broad outreach to agencies throughout the community, inviting them to participate in virtual meetings and community forums and/or to complete an online survey regarding needs and priorities. Agencies that were contacts included the CoC; homeless service providers; domestic violence service providers; veterans' groups; the City's Public Housing Authority; public agencies that address the needs of the qualifying populations; public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities; and, other agencies whose clientele includes HOME-ARP qualifying populations. Table 1 includes a partial list of the agencies that were contacted as part of the consultation process.

Table 1 - Consultation

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Lynn Continuum of Care	 Local planning body 	CoC Meeting	See the summary of
(CoC)	that coordinates		feedback in Section C
	housing and services		below
	funding for homeless		
	and at-risk families and		
	individuals		
	 Comprised of 29 		
	agencies and 71		
	individuals		
Affordable Housing	 Affordable Housing 	 CoC Meeting 	See the summary of
Associates	Provider for all	 Community Forum 	feedback in Section C
	qualifying populations		below
	Fair Housing		
	Organization		
	CoC member		
Amirah Inc.	 Domestic violence 	 Community Forum 	See the summary of
	service provider	 Direct one-on-one 	feedback in Section C
	CoC member	consultation	below
Bridgewell	 Homeless service 	 CoC Meeting 	See the summary of
	provider	 Community Forum 	feedback in Section C
	 Local agency that 		below
	addresses the needs of		
	qualifying populations,		
	including recovery and		
	disability services		
	CoC member		
Catholic Charities	 Homeless service 	 CoC Meeting 	See the summary of
(CCN/CCAB)	provider	 Community Forum 	feedback in Section C
	 Local agency that 		below
	addresses the needs of		
	qualifying populations		
	 CoC member 		

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Children's Friend &	Organization that	CoC Meeting	See the summary of
Family Services/ Justice	addresses fair housing	 Community Forum 	feedback in Section C
Resource Institute (JRI)	and civil rights needs		below
	of qualifying		
	populations		
	CoC member		
City of Lynn	Local government that	Direct one-on-one	The City expressed a
	addresses the needs of	consultation	commitment to work
	all qualifying	CoC meeting	with LHAND and the CoC
	populations	 Community Forums 	to end homelessness in
Development of Marchal	• CoC member	0.011	Lynn
Department of Mental	Public agency that	CoC Meeting	See the summary of
Health (DMH)	addresses the needs of	 Community Forum 	feedback in Section C below
	all qualifying populations		below
	CoC member		
Eliot Community Human	Local agency that	• CoC Mooting	See the summary of
Services (Eliot)	addresses the needs of	CoC MeetingCommunity Forum	feedback in Section C
Services (Ellot)	qualifying populations,	Community Forum	below
	including adults with		Selew
	mental illness, and		
	children, youth and		
	families		
	CoC member		
Greater Lynn Senior	Local agency that	CoC Meeting	See the summary of
Services (GLSS)	addresses the needs of	Community Forum	feedback in Section C
	qualifying populations,		below
	including seniors and		
	disabled individuals		
	CoC member		
Haven Project	 Local agency that 	 CoC Meeting 	See the summary of
	addresses the needs of	 Community Forums 	feedback in Section C
	the 17-24 year old		below
	homeless young adult		
	population		
11 1: Al 14/ 1:	• CoC member	D: .	6 11
Healing Abuse Working	Domestic violence	Direct one-on-one	See the summary of
for Change (HAWC)	service provider	consultation	feedback in Section C
Loading through	CoC member	• CoC Mastina	below See the summary of
Leading through	 Local agency that addresses the needs of 	CoC Meeting Community Forum	See the summary of feedback in Section C
Empowering Opportunities Inc. (LEO)	qualifying populations	Community Forum	below
opportunities inc. (LLO)	CoC member		SCIOW
Lynn Community	Local community	• CoC Mosting	See the summary of
Connections Coalition	coordinating group	CoC MeetingCommunity Forum	feedback in Section C
Conficctions Coantion	that addressed the	- Community Forum	below
	needs of qualifying		20.011
	populations, including		
	families, individuals,		
	and senior citizens		
	i .	i.	1

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback		
	• CoC member				
Lynn Community Health Center	 Local agency that addresses the needs of qualifying populations, including minority and immigrant populations CoC member 	CoC Meeting Community Forum	See the summary of feedback in Section C below		
Lynn Housing & Neighborhood Development (LHAND)	 Local government that addresses the needs of all qualifying populations Public housing agency CoC member 	 Direct one-on-one consultation CoC Meeting Community Forums 	LHAND expressed a commitment to work with the City of Lynn and the CoC to end homelessness in Lynn		
Lynn Public Schools (LPS)	 Public agency, addresses the needs of all qualifying populations CoC member 	• CoC Meeting • Community Forum	See the summary of feedback in Section C below		
Lynn Shelter Association	 Homeless service provider (emergency shelter, housing, and services) CoC member 	• Community Forum	See the summary of feedback in Section C below		
Massachusetts Coalition for the Homeless	 Regional agency that addresses the needs of the homeless and those at-risk of losing their homes CoC member 	CoC MeetingCommunity Forum	See the summary of feedback in Section C below		
My Brothers Table	 Agency that addresses the needs of qualifying populations CoC member 	CoC Meeting Community Forum	See the summary of feedback in Section C below		
North Shore Community Development Coalition, Inc. (NSCDC)	Community coordinating group that addresses the housing and supportive services needs of youth, ages 18 – 24, who are aging- out of foster care or currently experiencing homelessness. CoC member	 CoC Meeting Community Forum 	See the summary of feedback in Section C below		
Northeast Justice Center (NJC)	 Organization that addresses fair housing and civil rights needs of qualifying populations CoC member 	CoC MeetingCommunity Forum	See the summary of feedback in Section C below		

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Pathways	 Local agency that addresses the needs of qualifying populations to provide adult education and training CoC member 	CoC Meeting	See the summary of feedback in Section C below
Veterans Affairs (VA)	 Agency that addresses the needs of the qualifying veteran population CoC member 	CoC MeetingCommunity Forum	See the summary of feedback in Section C below

C. Summarize feedback received and results of upfront consultation with these entities

The following feedback was received during the CoC meeting and community forums. Throughout the HOME-ARP consultation process and in other planning initiatives undertaken in recent years by the City, the need for affordable housing – both new permanent affordable units and temporary rental assistance – is the highest priority concern of residents, advocates and other stakeholders. As rent levels and housing prices continue to soar, low-income residents, especially those individuals and families who are in the HOME-ARP qualifying populations, face enormous challenges in finding and maintaining affordable housing:

- Need for rental assistance and additional affordable housing/subsidized units, including
 permanent affordable housing, especially accessible units for the City's senior and disabled
 populations that cannot navigate stairs, and low threshold affordable housing with fewer barriers
 to entry, i.e. for individuals with CORI issues.
- Need for additional shelter space. The Lynn shelter is generally full and people have to be turned away. The Lynn School Department reported that four homeless families were recently turned away from the shelter.
- Need for supportive services such as housing navigation services and case management services.
- Projects suggested for consideration of HOME-ARP funding included:
 - Funding for a fire prevention system, roofing, and other expenses at the emergency shelter as part of the shelter's move to the Osmund Building, a former hotel that the Lynn Shelter Association owns and manages.
 - Funding for capital improvements including an elevator that is being installed as part of the conversion of the Andrew Street (Henessey Project) SRO building into 51 affordable efficiency apartments with supportive services.
 - Funding for mobile showers and/or mobile laundry for the homeless, i.e. individual shower rooms that are built into buses or trailers that allow homeless residents to take hot showers in private.
 - Funding for additional supportive services at the shelter, including clinical health services, staffing for the medical van, and case management services.
 - o Housing (shelter and non-shelter) for the youth and young adult population.

A summary of the feedback received from individuals completing the HOME-ARP survey is included above in Section A, Consultation Process.

III. Public Participation

A. Dates of the public comment period and public hearing(s) Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- i. Date(s) of public notice: September 14, 2022 and September 20, 2022
- ii. Public comment period: September 16, 2022 October 1, 2022
- iii. Date(s) of public hearing: September 27, 2022

B. Describe the public participation process

In accordance with applicable fair housing and civil rights requirements and the City's citizen participation plan, the City provided for and encouraged citizen participation in the development of the HOME-ARP Allocation Plan. Opportunities for public review and comment prior to finalizing the HOME-ARP Allocation Plan included the following:

- The City invited over 250 individuals, representing 85 agencies, to participate in virtual community
 forums in June 2022 to discuss views of community needs and priorities. Information about the
 meetings was posted on social media, including the City's and LHAND's websites as well as the
 Mayor's Newsletter.
- The proposed HOME-ARP Allocation Plan was made available for public review during the period September 16, 2022 October 1, 2022, during which time citizens were afforded an opportunity to review and comment on the draft Plan.
- The Notice of Public Hearing was published in newspapers of local circulation on September 14, 2022 and September 20, 2022. A public hearing was held on September 27, 2022 to discuss the proposed HOME-ARP Allocation Plan. Approximately _______ individuals attended the public hearing to discuss the Plan and the proposed funding activities.

C. Describe efforts to broaden public participation

The City issued a public notice in the Daily Evening Item on September 14, 2022 and September 20, 2022 to inform the public of the opportunity to review and provide comments on the HOME-ARP Allocation Plan and the proposed allocations.

As noted above, in June 2022, the City convened two community forums and administered a survey to obtain citizen views and input regarding allocation of the HOME-ARP funds.

D. Comments and recommendations

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing.

The comments and recommendations received through the public participation process are summarized below: (TO BE ADDED FOLLOWING PUBLIC COMMENT PERIOD AND HEARING)

E. Summarize any comments or recommendations not accepted and state the reasons why
All public comments were considered during the development of the plan.

IV. Needs Assessment and Gaps Analysis

This section of the HOME-ARP Allocation Plan examines the size and demographic composition of the qualifying populations; and, identifies current available resources, unmet housing and service needs of these populations, gaps within the shelter/housing inventory and service delivery model, and priority needs for these populations.

A. Homeless needs inventory and gap analysis tables

Table 2, provided by the Lynn CoC based on the 2022 Annual Point In Time count, presents information on the estimated homeless population and current housing inventory to service this population. Additional data and narrative is included below.

Table 2 – Homeless Needs Inventory and Gap Analysis Table

Homeless														
		Current Inventory					Homeless Population				Gap Analysis			
	Far	nily	Adult	s Only	Vets	Family	HH (at HH least 1 (w/o	Vets	Victims of DV	Family		Adults Only		
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units	
Emergency Shelter	837	372	52	52	0									
Transitional Housing	0	0	0	0	0									
Permanent Supportive Housing	10	1	226	226	0									
Other Permanent Housing	0	0	1	1	0									
Sheltered Homeless						245	45	0	0					
Unsheltered Homeless						1	41	0	0					
Current Gap							_			#	#	#	#	

Data Source: Lynn Continuum of Care 2022

B. Size and demographic composition Describe the size and demographic composition of qualifying populations within the PJ's boundaries.

i. Homeless as defined in 24 CFR 91.5

Homelessness can take many forms, including living in a shelter and living unsheltered, either outside, in a vehicle, or seeking protection from the elements in places such as bus stations, parking lots and hallways. As such, it is difficult to accurately determine the size and demographic composition of the homeless population. The Annual Point in Time (PIT) count is one method of tabulating homelessness on a specific date each year. This method is generally an accurate count of people residing in shelters, but is widely recognized as an undercount for people who are unsheltered.

As shown on Tables 2 and 3, the 2022 PIT Count identified 332 households that were homeless in Lynn of which 290 (87.3%) were sheltered and 42 (12.7%) were unsheltered. The homeless population was comprised of 851 homeless people of which 808 (94.9%) were sheltered and 43 (5.1%) were unsheltered. It is estimated that almost 60% of Lynn's homeless population (500 individuals of which 25 were unsheltered) is chronically homeless. The high percentage of sheltered persons and households has been achieved due to the Lynn CoC's ability to develop a comprehensive housing and supportive service delivery system for the City's homeless; however, additional efforts are needed.

The 2022 PIT data indicates that more than half (53.8%) of the homeless population are children under the age of 18. Based upon Lynn's racial makeup, the Black/African American/African homeless population (35.4%) is disproportionally high as this populations represents less than 14% of the City's population. The demographic composition of the homeless population identified during the 2022 PIT count includes the following:

Age:

- 458 children under the age of 18 (53.8% of the homeless population), 1 of which was unsheltered;
- 337 adults over the age of 24 (39.6% of the homeless population) of which 42 were unsheltered; and,
- 56 young adults ages 18-24 (6.6% of the homeless population) all of which were sheltered.
- It should be noted that the ability to identity youth and young adults who are homeless is
 inadequate, mostly due to inefficient identification and tracking systems, and the numbers are
 likely to vastly understate the reality.

Gender:

- 443 females (52.0% of the homeless population) of which 20 were unsheltered;
- 387 males (45.5% of the homeless population) of which 21 were unsheltered;
- 17 with non-singular gender¹ (2.0% of the homeless population) of which one was unsheltered;
- Three transgender (0.4% of the homeless population) of which one was unsheltered; and,
- One with questioning gender (0.1% of the homeless population) who was sheltered.

Ethnicity:

- 430 Non-Hispanic/Latino (50.5% of the homeless population) of which 24 were unsheltered; and,
- 421 Hispanic/Latino (49.5% of the homeless population) of which 19 were unsheltered.

Race			

¹ For example, non-binary, genderfluid, agender, culturally specific gender.

- 352 White (41.4% of the homeless population) of which 20 were unsheltered;
- 301 Black, African American, or African (35.4% of the homeless population) of which 11 were unsheltered;
- 171 Multiple Races (20.1% of the homeless population) of which 6 were unsheltered;
- 14 Native Hawaiian or Pacific Islander (1.6% of the homeless population) of which 6 were unsheltered;
- Seven Asian or Asian American (0.8% of the homeless population) all of which were sheltered; and.
- Six American Indian, Alaska Native, or Indigenous (0.7% of the homeless population) all of which were sheltered.

Table 3 – Homeless Population

l a	ibie 3 – nom	eiess Populat	ion		
		Sheltered		Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Total Households and Persons					
Total Number of Households	290	0	0	42	382
Total Number of Persons	808	0	0	43	851
Number of Children (under age 18)	457	0	0	1	458
Number of Persons (18 to 24)	56	0	0	0	56
Number of Persons (over age 24)	295	0	0	42	337
Gender					
Female	423	0	0	20	443
Male	366	0	0	21	387
Gender that is not singularly "Female"	16	0	0	1	17
or "Male" (e.g. non-binary,					
genderfluid, agender, culturally					
specific gender)					
Questioning	1	0	0	0	1
Transgender	2	0	0	1	3
Ethnicity					
Non-Hispanic/Latin	406	0	0	24	430
Hispanic/Latin	402	0	0	19	421
Race					
American Indian, Alaska Native, or	6	0	0	0	6
Indigenous					
Asian or Asian American	7	0	0	0	7
Black, African American, or African	290	0	0	11	301
Native Hawaiian or Pacific Islander	8	0	0	6	14
White	332	0	0	20	352
Multiple Race	165	0	0	6	171
Chronically Homeless					
Total Number of Persons Chronically	475	0	0	25	500
Homeless					

Data Source: 2/22/2022 Lynn Point-In-Time Count

Another indicator of the number of homeless families in Lynn are households who are in the Emergency Assistance Shelter in Lynn. This program provides shelter only for households with children under age 21 or pregnant women — it does not assist childless adults. In 2021, an average of 240 households were housed in the Emergency Assistance Shelter. In 2022, 251 households were housed during the first quarter and 255 households were housed during the second quarter.

Additional source of data for the homeless population includes the Lynn Public Schools. As of June 2022, the Lynn Public Schools reported that they had 1,191 homeless students enrolled: two unaccompanied youth in shelter, 234 students in homeless shelters/motels/hotels, 602 unaccompanied youth/ doubled up, 206 students doubled up, and 147 students in foster care.

As shown on Table 4, the 2022 PIT Count identified that a significant number of Lynn's adult homeless population have a serious mental illness and/or a substance use disorder and large portions of these populations are unsheltered. The data includes the following:

- 80 adults with a serious mental illness (9.4% of homeless population) of which 18 or almost onequarter were unsheltered;
- 69 adults with a substance use disorder (8.1% of homeless population) of which 32 or almost one-half were unsheltered;
- Five adults with HIV/AIDS (0.6% of homeless population) of which three were unsheltered; and,
- Although there were no homeless adult survivors of domestic violence identified during the 2022 PIC Count, 59 survivors of domestic abuse were identified in emergency shelters during the 2021 PIT Count. In addition, from July 1, 2021 May 23, 2022, Healing Abuse Working for Change (HAWC) reports that 19 of their clients were entered into the HAWC Shelter Program.

Table 4 – Additional Homeless Populations

		Sheltered	Unsheltered	Total	
	Emergency	Transitional	Safe Haven		
Adults with a Serious Mental Illness	62	0	0	18	80
Adults with a Substance Use Disorder	37	0	0	32	69
Adults with HIV/AIDS	2	0	0	3	5

Data Source: 2/22/2022 Lynn Point-In-Time Count

ii. At Risk of Homelessness as defined in 24 CFR 91.5

HUD defines the population at-risk of homelessness as follows:

- 1) Annual income below 30% of median family income; AND,
 - Does not have sufficient resources or support networks; AND,
 - Meets one of the following conditions:
 - Multiple moves
 - Doubled-up
 - Facing eviction
 - Lives in a hotel or motel at their own expense
 - Lives in overcrowded housing
 - Exiting an institutional setting
 - Housing has characteristics of instability
- 2) Child or youth who does not meet the above requirements and is at risk according to other federal statutes

While it is difficult to identify the exact number of Lynn's population that is at-risk for homelessness, the following data sheds light on the size and demographic composition of this population. Based on the data

on Table 6 below, more than 4,500 households with income between 0% and 30% HAMI, which are experiencing one or more housing problems, may be at risk of becoming homeless.

Other data supports the projected size of this population. For example, during the first quarter of 2022 alone, 684 households were approved to receive Emergency Rental Assistance Program (ERAP) assistance totaling approximately \$6.3 million. In addition, during the year following the expiration of the state's eviction and foreclosure moratorium in October 2020, 55% of eviction filings in Massachusetts' six housing courts occurred in areas where the majority of residents identified as Black, Latino, Asian American/Pacific Islander, or Indigenous, even though only 42% of the state's renters live in those neighborhoods. In particular, evictions were more common in places with larger percentages of Black and Latino renters, among households headed by single mothers, and in places with higher concentrations of corporate landlords. According to 2021 U.S. Census population estimates, 43% of Lynn's residents are Hispanic or Latino as compared with 12.4% for Massachusetts and 18.5% nationwide. In addition, according to Impact Essex County's data for 2015-2019, 33% of all Lynn families with children under 18 are headed by female, single parents.

Below is additional discussion of the City's populations that are at risk of homelessness.

Low Income Households

Lynn is one of the poorest communities in the state based on per capita income, ranking 286 out of 300 Massachusetts cities and towns:

- An estimated 16% of Lynn residents have incomes below the poverty level compared with 9% statewide and 12% nationwide (Data Source: 2019 American Community Survey 1-Year Estimates).
- More than one in four households has an income of less than \$25,000, including approximately 10% with an income of less than \$10,000 (Data Source: "Housing Lynn: A Plan for Inclusive Growth").
- Lynn's median *renter* household income of \$34,096 is less than 40% of the City's median *homeowner* household income of \$85,892 (*Data Source: "Housing Lynn: A Plan for Inclusive Growth"*).

Based on the data shown below in Tables 5-7:

- 9,175 households in Lynn (about 28% of all households) are extremely low income (at 0%-30% HAMFI).
- 4,530 renter households at 0%-30% AMI and 775 owner households at 0%-30% AMI have at least one housing problem, i.e. lacks kitchen or complete plumbing, severe overcrowding, and/or severe cost burden.
- 415 renter households at 0%-30% AMI and 15 owner households at 0%-30% AMI live in substandard Housing, i.e. lacking complete plumbing or kitchen facilities
- 210 renter households at 0%-30% of AMI live in severely overcrowded living conditions. The
 overcrowding problem is growing. While overcrowding is always a concern for health and safety,
 it is an especially dangerous circumstance during the COVID-19 pandemic. Studies show that
 housing overcrowding is a driver of the virus's spread. Because many people of color and
 immigrants in Lynn have low incomes and are more likely to live in overcrowded conditions—as
 well as experience other circumstances that put them at risk, such as exposure at work—these

residents are also disproportionately contracting and dying of COVID-19 (Source: "Housing Lynn: A Plan for Inclusive Growth").

Table 5 - Total Households Table

	0-30%	>30-50%	>50-80%	>80-100%	>100%
	HAMFI	HAMFI	HAMFI	HAMFI	HAMFI
Total Households	9,175	5,530	5,020	3,520	9,735
Small Family Households	3,090	2,400	2,295	1,660	5,485
Large Family Households	635	640	780	520	1,290
Household contains at least one person 62-74	2,140	920	945	720	2,015
years of age					
Household contains at least one person age	1,480	660	430	310	525
75 or older					
Households with one or more children 6 years	1,915	1,545	1,270	745	1,320
old or younger					

Data Source: 2013-2017 CHAS

Table 6 – Severe Housing Problems

(Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

le : e:::	p.a									
		Renter				Owner				
	0-	>30-	>50-	>80-	Total	0-	>30-	>50-	>80-	Total
	30%	50%	80%	100%		30%	50%	80%	100%	
	AMI	AMI	AMI	AMI		AMI	AMI	AMI	AMI	
NUMBER OF HOUSEHOLDS										
Having 1 or more of four	4,530	1,150	295	280	6,255	775	830	385	195	2,185
housing problems										
Having none of four housing	3,110	2,535	2,435	1,380	9,460	345	1,015	1,905	1,670	4,935
problems										
Household has negative	345	0	0	0	345	75	0	0	0	75
income, but none of the										
other housing problems										

Data Source: 2013-2017 CHAS

Table 7 – Housing Problems

			Renter					Owner		
	0-30%	>30-	>50-	>80-	Total	0-30%	>30-	>50-	>80-	Total
	AMI	50%	80%	100%		AMI	50%	80%	100%	
		AMI	AMI	AMI			AMI	AMI	AMI	
NUMBER OF HOUSEHOLD	S									
Substandard Housing -	415	115	20	10	560	15	20	60	0	95
Lacking complete										
plumbing or kitchen										
facilities										
Severely Overcrowded -	210	90	75	65	440	0	0	15	10	25
With >1.51 people per										
room (and complete										
kitchen and plumbing)										

			Renter					Owner		
	0-30% AMI	>30- 50%	>50- 80%	>80- 100%	Total	0-30% AMI	>30- 50%	>50- 80%	>80- 100%	Total
		AMI	AMI	AMI			AMI	AMI	AMI	
Overcrowded - With	380	245	190	205	1,020	0	80	50	110	240
1.01-1.5 people per										
room (and none of the										
above problems)										
Housing cost burden	3,525	700	10	0	4,235	765	730	260	75	1,830
greater than 50% of										
income (and none of										
the above problems)										
Housing cost burden	1,520	1,915	585	50	4,070	230	500	995	560	2,285
greater than 30% of										
income (and none of										
the above problems)										
Zero/negative Income	345	0	0	0	345	75	0	0	0	75
(and none of the above										
problems)										

Data Source: 2013-2017 CHAS

Minority Households

Many minority households are at-risk of homelessness. Income disparities in Lynn are significant across racial and ethnic groups. The median income is \$55,129 for Asian households, \$46,269 for Black households, and \$43,092 for Latinx households compared to \$61,579 for non-Latinx White households (Data Source: American Community Survey, 2013-17 5-year estimates; note that Black households are inclusive of Afro-Latinx households). The median income for non-Latinx White households in Lynn is 43% higher than the median income of Latinx households and 33% higher than the median income of Black households (Data Source: "Housing Lynn: A Plan for Inclusive Growth").

The most common racial or ethnic group living below the poverty line in Lynn is Hispanic. In addition, the CoC's data reveals that Black/African American households in Lynn apply for Emergency Assistance Shelter benefits at a rate that is double that of their presence in the Lynn population (29% of EA applications vs. less than 14% of the Lynn population).

As shown in Table 8, there are 2,590 Hispanic households at 0%-30% of AMI with housing problems (lacks complete kitchen facilities, lacks complete plumbing facilities, more than one person per room, cost burden greater than 30%).

Table 8 - Disproportionally Greater Need 0 - 30% AMI

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,050	1,705	420
White	2,910	890	150
Black / African American	870	170	85
Asian	400	70	25
American Indian, Alaska Native	30	0	0

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Pacific Islander	0	35	45
Hispanic	2,590	510	115

Data Source: 2013-2017 CHAS

Persons with Severe Mental Illness

According to "Creating Community Health and Wellbeing In Lynn: A Community Health Needs Assessment and Plan" completed by the NextShift Collaborative in 2016, Lynn experiences disproportionately high rates of adverse social and economic conditions and disadvantage, which exacerbate health risks and drive many of the health challenges facing the community, including higher rates of mental health and substance use challenges relative to residents of other cities in the state.

The Department of Mental Health (DMH) currently provides community-based services to over 630 individuals living with severe and persistent mental illness in Greater Lynn. According to the US Substance Abuse and Mental Health Services Administration (SAMHSA), approximately 30% of chronically homeless people have a serious mental illness and others estimate that 1/3 of the general homeless population meet the diagnostic criteria for a "major" mental illness (Markowitz, 2006; Wong, 2002). These figures support the belief long-held by housing and mental health advocates that people with serious mental illness experience increased vulnerability for homelessness and housing instability (SAMHSA, 2017).

DMH currently supports over 150 individuals in Lynn with housing needs. Despite these efforts, the need outweighs the supply of affordable housing resources. There are currently 32 homeless individuals receiving DMH services in Lynn (11 sheltered, 5 unsheltered, 16 couch surfing). An additional 33 homeless individuals (21 sheltered, 12 unsheltered) in Lynn receive services from Eliot Community Human Services' PATH Program, a DMH-funded homeless outreach program providing supports to individuals with serious mental illness and co-occurring substance use disorders experiencing homelessness.

Persons with Substance Abuse

The precise number of persons in Lynn with alcohol and other drug addictions is difficult to determine; however, according to the Massachusetts Department of Public Health, Bureau of Substance Abuse Services (BSAS), during FY2017, 2,214 individuals from the City were admitted to treatment programs (Data Source: BSAS Description of Admissions). Due to the pervasive nature of drug and alcohol problems nationwide, this is a conservative estimate of the population of persons with alcohol and other drug addictions in the City:

- Lynn has one of the highest rates of overdose deaths in Massachusetts at 64.8 per 100,000 in 2017, more than double state rate of 28.4 and quadruple the national rate of 14.6 (Source: Massachusetts Department of Public Health).
- While Lynn represents 1.4% of the state's population, the number of admissions from the City represents 2.3% of statewide admissions.

^{*}The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3.

More than one person per room, 4.Cost Burden greater than 30%

Massachusetts has repeatedly ranked in the top ten states nationwide for opioid overdose deaths. In 2021, there were 2,234 confirmed opioid related overdose deaths statewide. This does not include deaths that are suspected to be opioid related, or the cases still under investigation. The number of confirmed opioid-related overdose deaths for all intents in Lynn rose from 47 in 2015 to 61 in 2021 (Data Source: Massachusetts Department of Public Health, Number of Opioid-Related Overdose Deaths, All Intents by City/Town 2015-2021)

Individuals admitted to BSAS contracted programs during FY2017 had the following characteristics (*Data Source: BSAS Description of Admissions*):

- 62% male, 74% white, 81% non-Hispanic, 72% never married
- 89% between the ages of 18 and 50 (13% ages 18-25, 22% ages 26-30, 38% ages 31-40, and 16% ages 41-50)
- 55% unemployed
- 32% homeless
- 49% past year needle use
- 46% with prior mental health treatment

Persons with HIV/AIDS

According to the Massachusetts Department of Public Health Office of HIV/AIDS, as of January 1, 2022, an estimated 516 people in Lynn were living with HIV (*Data Source: 2022 Massachusetts HIV/AIDS Epidemiologic Profile, Regional HIV/AIDS Epidemiologic Profile of Lynn, Massachusetts*).

• Lynn ranked as the eighth highest community statewide for average number of HIV infection diagnoses per 100,000 for the period 2018-2020 (average of 13.8 per 100,000),

Individuals living with HIV/AIDS in Lynn had the following characteristics:

- 61% assigned male at birth, 39% assigned female at birth
- 28% white (non-Hispanic), 36% Black (non-Hispanic), 30% Hispanic/Latino, and 4% Asian/Pacific Islander;
- 58% were born in the United States/Puerto Rico/U.S. Dependency and 42% were born outside of the United States/Puerto Rico/U.S. dependency; and,
- 22% under age 40, 19% ages 40-49, 34% ages 50-59, and 26% ages 60 and above.

Households that Speak a Language other than English at Home

The percentage of foreign born people in Lynn is 37% compared with 17% statewide and 14% nationwide (*Data Source: 2019 American Community Survey 1-Year Estimates*). The percentage of the population that speaks a language other than English (52%) is more than twice that of the U.S. (22%) and Massachusetts (24%) percentages, with Spanish being the most common language (*Data Source: 2020 American Community Survey 5-Year Estimates*).

Table 9 - Foreign Born Population and Language Spoken at Home

	Lynn, MA	MA	U.S.
Place of Birth*			
Native Population	63%	83%	86%
Foreign-Born Population	37%	17%	14%

	Lynn, MA	MA	U.S.
Language Spoken at Home**			
English Only	48%	76%	79%
Language Other Than English	52%	24%	22%
Spanish	37%	9%	13%
Other Indo-European Languages	8%	9%	4%
Asian and Pacific Islander Languages	1%	4%	4%
Other Languages	3%	1%	1%

^{*}Data Source: 2019 American Community Survey 1-Year Estimates

- For residents ages 5 and older for whom poverty status is determined, an estimated 16% of people who speak a language other than English at home are below the poverty level (Data Source: American Community Survey, 2019 1-Year Estimates).
- An estimated 48% of residents who speak a language other than English at home have less than a high school education as compared with 7% of residents who speak only English at home (Data Source: American Community Survey, 2019 1-Year Estimates).

Persons with a Disability

Lynn's population includes an estimated 13,458 disabled individuals, which accounts for approximately 14% of the City's population, compared to 12% statewide and 13% nationwide (*Data Source: 2020 American Community Survey 5-Year Estimates*).

- Of these individuals, 12% (1,602) are under the age of 18; 54% (7,223) are between 18 and 64; and 34% (4,633) are 65 and over (*Data Source: 2020 American Community Survey 5-Year Estimates*)
- 30% of the City's disabled population is below the poverty level and 14% is 100% to 149% of poverty level (Data Source: American Community Survey, 2019 5-Year Estimates).
- Median earning for the City's disabled population age 16 or older with earnings is \$30,985 (Data Source: American Community Survey, 2019 5-Year Estimates).
- Assuming that at least 51% of disabled residents are in need of housing assistance, an estimated 6,864 disabled persons in Lynn are in need of housing assistance.

Youth and Young Adults

Reports from several sources, including the Department of Elementary and Secondary Education (DESE) show rising numbers of homeless youth in Massachusetts.

- The 2018 Massachusetts plan to End Youth Homelessness reported 3,789 unaccompanied youth and young adults (YYA) experiencing homelessness over the course of one year in Massachusetts. The same report highlighted several alarming statistics among homeless youth subpopulations. Data shows that 24% of YYA experiencing homelessness identify as LGBTQ+, black YYAs are more than four times as likely to experience homelessness as compared to the overall population of YYAs, and Latinx YYAs are more than 2.5 times as likely to experience homelessness when compares to their counterparts in Massachusetts.
- Lynn's population includes an estimated 27,707 youth between the ages of 5 and 19, accounting
 for approximately 29% of the City's population (Source: American Community Survey, 2019 1-Year
 Estimates). Public School enrollment data indicates that 65% of public school students are
 economically disadvantaged, 79.5% have high needs, and for 61% English is not their first

^{**}Data Source: 2020 American Community Survey 5-Year Estimates

- language (Data Source: Massachusetts Department of Elementary and Secondary Education). A significant percentage are "at risk" for low educational attainment, substance abuse, health problems, and involvement with the criminal justice system.
- The Haven Project is the only organization north of Boston dedicated specifically to providing age appropriate services to a growing, vulnerable 17-24 year-old homeless young adult population. The organization implements its mission through six essential focus areas: basis needs, employment, housing, education, health, and community engagement and provides direct service to more than 220 homeless unaccompanied youth ages 17-24 each year, with referrals to other youth serving organizations for hundreds more who don't meet intake criteria based on age, homelessness or other factors.

Seniors

Seniors comprise a large group of citizens in Lynn that are at-risk of homelessness:

- Adults aged 65 to 84 comprise 10% of the City's population and those aged 85 or older comprise 2% of the population. The population of people 55 and older has grown 8% since 2010 from roughly 19,800 people to 21,400 people and are expected to grow 20% over 2010 levels by 2030 (Data Source: "Housing Lynn: A Plan for Inclusive Growth").
- An estimated 21% of residents 65 and older had income below the poverty level with 38% having income less than \$20,000 (Data Source: Massachusetts Healthy Aging Community Profile).
- There are 2,140 households with 0%-30% HAMI that contain at least one person 62-74 and 1,480 households with 0%-30% HAMI that contain at least one person age 75 or older (*Data Source: 2013-2017 CHAS*).

Greater Lynn Senior Services provides a wide range of services to elders in the Greater Lynn area. The services range from home care, counseling, nutrition, health care and transportation to protective services for elders at risk due to elder abuse or neglect. Each year, GLSS receives requests for housing assistance for over 200 elders who are homeless or facing eviction. During the period January 1, 2022 – June 30, 2022, GLSS reported completing intake for 105 Lynn residents, specifically for housing advocacy support. Demographic information for these clients include the following:

• Ethnicity:

Hispanic: 26 (24.8%)Non-Hispanic: 79 (75.2%)

Race:

White: 78 (74.3%)Black: 21 (20.0%)Asian: 6 (5.7%)

Gender:

Female: 54 (51.4%)Male: 51 (48.6%)

Language:

English: 73 (69.5%)Spanish: 24 (22.8%)Khmer: 3 (2.9%)

Other: (Arabic, Farsi, Haitian creole, Nigerian dialect) 5 (4.8%)

- Income:
 - o EXL (below \$28,200): 94 (89.5%)
 - Low (between \$28,201 \$47,000): 9 (8.6%)
 - Moderate (\$47,001 \$70,750): 2 (1.9%)
- Age:
 - Below 60: 9 (8.6%)
 60 65: 31 (29.5%)
 66-75: 50 (47.6%)
 - o 75-85: 9 (8.6%)
 - 0 86+: 6 (5.7%)

Female Heads of Household

Female heads of households with children comprise a substantial portion of the extremely low-income population in the City who are at imminent risk of either residing in shelters or becoming unsheltered.

- 19% of households are headed by a single female compared with 12% statewide and 12% nationwide (*Data Source: 2020 ACS 5-Year Estimates*).
- As previously noted, according to Impact Essex County's data for 2015-2019, 33% of all Lynn families with children under 18 are headed by female, single parents.
- iii. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Domestic abuse is a leading cause of homelessness across the country and in Lynn. According to Jane Doe Inc. (JDI), the Massachusetts Coalition Against Sexual Assault and Domestic Violence, "Sexual assault, domestic violence, stalking, harassment, violence against women, and other forms of gender-based violence are pervasive and costly issues in Massachusetts, across the country, and around the world."

For the sixteenth consecutive year, on September 9, 2021, the National Network to End Domestic Violence (NNEDV) conducted a one-day unduplicated count of adults and children seeking domestic violence services in the United States. This survey documents the number of individuals who sought services in a single 24-hour period, as well as the types of services requested, the number of service requests that went unmet due to a lack of resources, and the issues and barriers that domestic violence programs face as they strive to provide services to victims of domestic violence. Based on the one-day count, 2,302 victims were served in one day in Massachusetts (*Data Source: National Network to End Domestic Violence*).

The precise number of survivors of domestic violence in Lynn is not known; however, the data below provides valuable information on this vulnerable population. Although the 2022 PIC Count showed no homeless adult survivors of domestic violence, the data from the 2021 PIT Count indicated that there were 59 victims of domestic violence in emergency shelters.

HAWC (Healing Abuse Working for Change) strives to help abused women, children, men, and nonbinary people live free from violence and fear. As a leading domestic violence agency in Massachusetts, HAWC provides a domestic violence helpline, emergency shelter, legal services, advocacy and counseling services to hundreds of families in the North Shore area each year. Below is information on the number and characteristics of Lynn clients served by HAWC during the eleven month period July 1, 2021 – May 23, 2022:

- 660 new clients were served.
- 19 clients were entered into the HAWC Shelter Program.
- 156 clients were white, 79 were Black/African American, 11 were Asian, 286 were Hispanic/Latino, 16 were multiracial, 112 were of unknown race.
- Income levels for 26.8% of the clients were known. For those clients whose income levels were know, 48.6% (86) were persons with no or very low income, 43.5% (77) were persons with low income, 6.8% (12) were persons with moderate income, and less than 1.1% (2) were persons with high income).
- Age was known for 93.5% (43) of the clients. For those clients whose age was known: 2.6% (16) were ages 0-17, 11.7% (72) were ages 18-24, 77.6% (479) were ages 25-59, 8.1% (50) were ages 60+.
- 86.5% (571) of the clients served were female, 11.5% (76) were male, and 2.0% (13) were identified as other or unknown.
- 8.3% (55) of the clients served were persons living with disabilities.
- Language was known for 97.0% (640) of the clients. For those clients for whom language was known: 65.5% (419) spoke English and 31.2% (200) spoke Spanish. Other languages spoken that accounted for 3.3% (21) of the clients served included Haitian Creole, Portuguese, Cambodian, Russian, Arabic.

Amirah provides aftercare, resources, and opportunities to women who have survived different forms of sexual exploitation, sex trafficking, and prostitution. Amirah does this by offering residential recovery opportunities, organizing outreach efforts, and educating communities, providers, and policy makers on the unique challenges victims and survivors face in the Northeastern United States. Data from Amirah indicates that about half of its clients have children under the age of 18, about 80% have issues with substance use, and all have mental health issues as a result of trauma sustained while trafficked.

For the rapid rehousing program launched in January 2022 for which Amirah receives funding through LHAND, as of mid-June 2022, Amirah has served seven women. The demographic information for this population is as follows:

- All seven of the women were white and spoke English; two were Hispanic and five were non-Hispanic.
- Four of the women were ages 24-29, two were in their 30s, and one was in her 40s.
- Four of the seven women were disabled.
- All seven women had annual income below \$20,000 three of the women were zero income, one had annual income below \$5,000, and three had annual income between \$10,000 and \$18,000.
- iv. Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

The following HUD definitions apply:

- 1) Other populations requiring services or housing assistance to prevent homelessness is defined as formerly homeless households who are currently housed, but need additional assistance to avoid a return to homelessness.
- 2) Other populations at the greatest risk of housing stability is defined as:
 - Annual income at or below 30% of median family income and is experiencing severe cost burden (i.e. paying more than 50% of monthly household income toward housing cost);
 OR
 - b. Has annual income that is at or below 50% of the area median income and meets at least one of the following conditions:
 - i. Multiple moves
 - ii. Doubled-up
 - iii. Facing eviction
 - iv. Lives in a hotel or motel at their own expense
 - v. Lives in overcrowded housing
 - vi. Exiting an institutional setting
 - vii. Housing has characteristics of instability

For purposes of this Plan, the size and demographic composition of other populations requiring prevention assistance or with the greatest risk of housing instability share very similar characteristics of the at-risk population. As such, please refer to the information provided in Section ii. At Risk of Homelessness. In addition, severe housing cost burden (i.e. paying more than 50% of monthly household income toward housing cost) is one of the greatest predictor of housing instability and the need for services or housing assistance to prevent homelessness. Below is a description of this vulnerable population.

According to CHAS data in Table 10 below, there are an estimated 4,790 Lynn households between 0% and 30% of AMI that experience severe cost burden, i.e. paying more than 50% of monthly household income toward housing cost, of which 4,025 are renter households and 765 are owner households.

Table 10 - Cost Burden > 50%

		Re	nter		Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOUS	SEHOLDS							
Small Related	1,875	425	10	2,310	180	280	80	540
Large Related	315	15	0	330	25	100	35	160
Elderly	765	99	0	864	385	190	30	605
Other	1,070	165	0	1,235	175	160	115	450
Total need by income	4,025	704	10	4,739	765	730	260	1,755

Data Source: 2013-2017 CHAS

In addition, data presented in the "Housing Lynn: A Plan for Inclusive Growth" report, indicates:

An estimated 51% of renters are housing-cost burdened; 53% of that group is severely housing
cost burdened. By contrast, only 32% of owner households are housing cost burdened; 42% of
that group is severely housing cost burdened.

- An estimated 63% of low-income households (regardless of tenure) are housing cost burdened; 52% of that group is severely housing cost burdened.
- While 37% of White households are cost burdened, more than half of Latinx (55%) and nearly half of Black households (47%) are cost burdened.

C. Current resources

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing.

In collaboration with the City, the CoC has developed a comprehensive housing and supportive services delivery system consisting of emergency shelter, permanent housing, rapid rehousing, and permanent supportive housing units for both individuals and families. Since its inception, the various organizations that comprise the CoC have built a broad-based and coordinated system of housing resources and supportive services designed to move homeless families and individuals toward permanent housing and economic self-sufficiency; however, as noted, the level of need – particularly with respect to affordable housing - vastly exceeds the resources available. The primary services that CoC member organizations provide to homeless families and individuals under the categories prevention, outreach, and supportive services include emergency housing assistance, housing search, housing and support services for abused women and their children, rental assistance, legal services, rep payee, outreach, case management, free meals, alcohol/substance abuse and mental health services.

The following narrative and table provide a summary of current resources available to assist qualifying HOME-ARP populations.

Table 11 - Homeless Prevention Services Summary

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV					
	Homelessness Prevention Services							
Counseling/Advocacy	Х	Х	Х					
Legal Assistance	Х	Х						
Mortgage Assistance								
Rental Assistance	Х	Х	Х					
Utilities Assistance	Х	Х	Х					
	Street Outreach S	ervices						
Law Enforcement	Х	Х						
Mobile Clinics								
Other Street Outreach Services	Х	Х	Χ					
	Supportive Ser	vices						
Alcohol & Drug Abuse	Х	X	Х					
Child Care	Х	X						
Education	Х	X	Х					
Employment and Employment								
Training	X	X						
Healthcare	X	X	Χ					
HIV/AIDS	X	X	Χ					
Life Skills	X	X						

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Mental Health Counseling	X	X	Х
Transportation	X		
	Other		
Food Distribution/Nutrition	Х	Х	

Mainstream Services

Mainstream services available from Lynn CoC agencies and other community organizations include job training and employment search, educational programs such as ABE and ESOL, citizenship classes, primary health care services and walk in health clinics.

Job training and employment services are provided by Bridgewell and Eliot Community Human Services. Services include training in computer skills, instruction in resume preparation and interview skills, and follow-up employment services, including educational and vocational goals assessment and career plan development. Their staff facilitate referrals and educate clients about services available through its comprehensive work readiness and job placement program. In addition, staff visit other community agencies to ensure outreach to as many individuals as possible and provide clients with interview-appropriate attire when needed.

Educational services, including GED preparation, Adult Basic Education (ABE) and English for Speakers of Other Languages (ESOL) are provided by Catholic Charities and by Pathways Inc. on a referral basis. Citizenship classes are provided by Catholic Charities. Clients are provided citizenship examination preparation, assistance in filling out the citizenship application and locating a testing site.

Legal services are provided to low income and elderly residents by Northeast Justice Center (NJC) and Eliot Community Human Services. Services include elder, employment, family, and housing law, public benefits, and community development. NJC provides legal advocacy to clients for benefit maximization and eviction defense to prevent homelessness. NJC works to ensure that consumers identified as having unutilized entitlement take all necessary steps to acquire the identified benefits, and provide legal advocacy in administrative proceedings as necessary when consumers are denied benefits to which they are entitled. Through the work of NJC, individuals are helped to understand their rights, identify illegal barriers to housing access and recognize discrimination. NJC assists individuals who face illegal housing access barriers to overcome those barriers and acquire the housing desired. NJC assists households to secure access to public and subsidized housing resources and provide direct legal assistance to those improperly denied. NJC also represents homeless individuals and families who are improperly denied access to the emergency shelter system. Through its Tenancy Preservation Program (TTP) Eliot Community Human Services, working out of the Lynn Court provides clinical consultation in eviction cases that are entitled to "reasonable accommodations" due to the presence of a mental health or physical disability. Eliot Community Human Services clinicians work with the Housing Court to maintain stable housing by assisting tenants with referrals for treatment and support in order to ameliorate the causes of lease violations.

Walk-In Clinics are available at the Lynn Community Health Center and the Lynn Shelter Association. Services are offered on an open or necessary basis.

Current Housing Inventory

Table 12 – Housing Inventory

	Family		Adult	s Only	Veterans		
	# of Beds	# of Units	# of Beds	# of Units	# of Beds		
Emergency Shelter	837	372	52	52	0		
Transitional Housing	0	0	0	0	0		
Permanent Supportive	10	1	226	226	0		
Housing							
Other Permanent	0	0	1	1	0		
Housing							
Total	847	373	279	279	0		

Data Source: CoC

In addition to limited state and federally funded public housing and rental voucher assistance, for which there are lengthy waiting lists, supportive housing and shelter beds to serve homeless and special needs populations have been brought on line over a multi-year period beginning in the early 1990's. Subpopulations provided housing includes the chronically homeless, families with children, homeless individuals, veterans, and unaccompanied youth. Currently, a total of 847 beds including emergency shelter, transitional housing and permanent housing beds are available for families and 279 beds are targeted to households with only adults. Family housing utilizes scattered site units, project-based and congregate or group units. Housing for individuals without children includes SRO beds and project-based units. Unaccompanied youth are primarily housed in congregate facilities. Major funding sources for housing beds include State emergency shelter and transitional housing resources, McKinney-Vento supportive housing, Shelter Plus Care and Section 8 Mod Rehabilitation.

Below is a summary of housing and supportive services provided to families and/or individuals that are eligible qualifying populations under HOME-ARP:

Survivors of Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

Supportive services needs of survivors of domestic violence and their families include assistance in facilitating access to emergency services, counseling, support groups, legal advocacy, children's programs, outreach programs, and permanent housing. Among the agencies which provide services to this population are HAWC, Amirah, The Haven Project, Northeast Legal Aid and others.

For example, as a leading domestic violence agency in Massachusetts, HAWC provides a domestic violence helpline, emergency shelter, legal services, advocacy and counseling services to hundreds of families in the North Shore area each year. Amirah provides aftercare, resources, and opportunities to women who have survived different forms of sexual exploitation, sex trafficking, and prostitution. Amirah does this by offering residential recovery opportunities, organizing outreach efforts, and educating communities, providers, and policy makers on the unique challenges victims and survivors face in the Northeastern United States.

Persons with Severe Mental Illness

The Department of Mental Health (DMH) currently provides community-based services to individuals living with severe and persistent mental illness in Greater Lynn. DMH works to secure housing resources for its most vulnerable clients through several types of resources including integrated affordable housing, and supported group living environments. Eliot Community Human Services' PATH Program, a DMH-funded homeless outreach program provides supports to individuals with serious mental illness and co-occurring substance use disorders experiencing homelessness.

To ensure that persons returning from mental and physical health institutions receive appropriate supportive housing, the CoC coordinates with the Commonwealth of Massachusetts' discharge policies and guidelines. The Commonwealth has developed and continues to develop policies to prevent individuals who are discharged from institutions and health care facilities from becoming homeless. Individual departments of the Commonwealth have worked to ensure appropriate discharge planning internally as well.

Persons with Substance Abuse

In addition to housing assistance, supportive services to help persons with alcohol or other drug addictions overcome their addictions include outpatient care, individual and group counseling, education and psychopharmacology for individuals, adults and families. A partial list of agencies serving persons with alcohol or other drug addictions includes Lynn Community Health Center; Bridgewell's Project COPE Program; Inn Transition Family Sober Living Program; and the Massachusetts Department of Public Health.

Persons with HIV/AIDS and their Families

A partial list of agencies serving persons with HIV/AIDS and their families includes Lynn Community Health Center and Cornerstone Wellness Center. Housing and supportive services provided include housing advocacy resources, and facilitated access to health care, nutrition, and transportation.

Households that Speak a Language other than English at Home

Many Lynn agencies provide services to Lynn's non-English speaking residents including, but not limited to: Pathways Inc; Lynn Community Health Center; LEO Inc; and others. Minority/immigrant households that speak a language other than English at home need supportive services, including education, job training, health care and other services that are provided in a culturally sensitive and appropriate manner. These include GED preparation, Adult Basic Education (ABE), and English as a Second Language (ESL). In addition, access to housing, jobs and other services is available from public service agencies serving the Lynn community.

Persons with Disabilities

A partial list of agencies serving people with disabilities includes Lynn Community Health Center; Independent Living Center of North Shore and Cape Ann; Greater Lynn Senior Services; All Care VNA; Cerebral Palsy Association and many others. In addition to rental assistance and home repair assistance for homeowners, supportive service needs of persons with physical disabilities include assistance accessing housing facilities and community-based healthcare. Psychiatric evaluation, crisis intervention, stabilization, and follow up are needed for persons requiring mental health services.

Additionally, legal services, housing advocacy and financial education and life skills training are needed for the City's disabled population to assist them in becoming economically self-sufficient and to assist them in avoiding homelessness.

Youth and Young Adults

Supportive service needs of youth include nutrition and health care; HIV prevention; violence and substance abuse prevention; career development; after school and recreational activities and educational services, including sports, arts, college preparation training and employment; cultural support; teen pregnancy prevention; and gang prevention. There is a broad network of agencies providing programming services for Lynn youth including, but not limited to, the Haven Project, Girls Inc., Lynn School Department

and many others. For example, the Haven Project is dedicated specifically to providing age appropriate services to a growing, vulnerable 17-24 year-old homeless young adult population. The organization implements its mission through six essential focus areas: basic needs, employment, housing, education, health, and community engagement

Elderly and Frail Elderly

Supportive service needs of the elderly and frail elderly include rental assistance, home repair loans and grants (for elderly homeowners), assistance accessing home care and health care, transportation, nutrition, medical services, meals for home-bound, frail and isolated elders, as well as social, educational and recreational activities for seniors. There are a wide range of agencies that provide housing support and/or services to the elderly and frail elderly population. A partial list includes Greater Lynn Senior Services; Lynn Community Health Center; Council on Aging; LHAND; Catholic Charities North; All Care VNA; Eliot Community Human Services; LEO, Inc; Northeast Legal Aid; faith-based and many other agencies.

Veterans

The City's Veterans Services Office, which is represented on the CoC, oversees services for veterans eligible for financial assistance under MGL c. 115 which provides services and housing resources to low income veterans. Housing assistance may include short-term rental assistance, back rent, utility assistance, first and last month rent or security deposits to prevent homelessness. Veterans not eligible for MGL c. 115 are provided resources from Lynn's CDBG, HOME or ESG programs and/or the state-funded RAFT Program. Health services for veterans are available through the Veterans Outreach Center located in Lynn. The Lynn CoC has been certified by HUD as having achieved functional zero related to veteran homelessness.

D. Describe the unmet housing and service needs of qualifying populations

The need for quality, affordable housing – both permanent units and temporary rental assistance - is the most pervasive need across all of the City's HOME-ARP qualifying populations. In addition to the impacts caused by soaring rents in the City and region, this need has been exacerbated by the many impacts of the COVID-19 pandemic, which have placed enormous hardships on these populations. Below is a summary of the housing and service needs of the HOME-ARP populations that were identified during the development of the HOME-ARP Allocation Plan.

i. Homeless as defined in 24 CFR 91.5

The Homeless Needs Inventory and Gap Analysis (Table 2), compares the current inventory of shelter and housing resources for persons experiencing homelessness to the PIT count on one particular night. This is not a true indicator of need since the PIT count is widely recognized as undercounting people who are unsheltered. As such, there exists a need for additional emergency housing for the City's homeless population as well as affordable permanent housing, rental assistance and supportive services.

The following needs were identified through the community consultation process:

Housing Needs

- Affordable low threshold housing, including acceptance of those with CORIs.
- Additional beds at the Lynn Shelter.
- Individual rooms for shelter.
- Surge capacity for shelter when needed, i.e. when weather conditions are bad.
- Improved conditions at the shelter; larger space with cleaner conditions.

Supportive Service Needs

- Connect tenants with rights advocates, childcare services, and job training opportunities.
- Provide help with basic activities, such as paying bills, cleaning and organizing, early intervention for mental and other health issues.
- On-site case managers and service access.
- Recovery coaches to help support clients.

ii. At Risk of Homelessness as defined in 24 CFR 91.5

The primary driver of homelessness is the lack of affordable housing. Lynn's housing market is increasingly characterized by a low vacancy rate, rising rents, and a lack of housing units affordable to Lynn residents. The inability to afford housing is a primary cause of homelessness; the needs of Lynn's homeless residents and those at risk of homelessness cannot be met without addressing the dramatic need for more affordable housing. In addition to affordable housing, those at risk of homelessness need continued access to emergency assistance in the form of rental assistance, utility assistance, food and other basic needs as well as increased efforts to inform residents of homeless prevention services and the importance of early intervention.

The following additional needs were identified through the consultation process:

Persons with Severe Mental Illness

The need for low-threshold affordable housing along with access to low-barrier housing subsidies would be of benefit to individuals with serious mental health challenges who are struggling with housing insecurity in Lynn. State supported capital resources such as Facilities Consolidation Funds may be able to be leveraged to develop affordable, integrated housing for homeless individuals including those served by the Department of Mental Health.

Persons with Substance Abuse

Persons with alcohol and other drug addictions often require assistance to overcome their addictions, including outpatient care, individual and group counseling, education and other services.

HIV/AIDS Population

Housing and supportive services needs for the HIV/AIDS population includes housing advocacy resources, facilitated access to health care, nutrition, transportation and others.

Senior and Disabled Qualifying Populations

Primary needs for these groups include, but are not limited to, rental assistance, home repair loans and grants (for elderly homeowners), home care and health care, transportation, and nutrition. The need for community-based health care is acute among the frail elderly group in order to reduce the need for nursing home care. Due to physical challenges, many seniors need units that are accessible and/or retrofitting of existing units to improve safety and reduce hazards. Housing for seniors should provide or be in close proximity to information, transportation, social and health services and opportunities for community involvement.

- There are far too few subsidized units available, and applicants are routinely notified of wait lists that take 3-5 years before a placement is available. Lynn's aging, low-income population is in desperate need of additional subsidized housing placements.
- There is great need for physically accessible units that are designed to allow mobility and access. Psychiatric evaluation, crisis intervention, stabilization, and follow up may also be needed for persons requiring mental health services
- There is a need for supportive services connected with housing for some of the City's seniors who can remain in independent living, but need some supports. An excellent model for this is St. Theresa's House, a subsidized assisted living development in Lynn.
- Facing employment challenges, persons with disabilities need supportive services to help them
 become economically self-sufficient and to prevent homelessness. Legal services, housing
 advocacy and financial education and life skills training would benefit the City's disabled
 population.

Youth and Young Adult (YYA) Qualifying Populations

- The need for affordable and supportive housing for homeless YYAs who have extremely low income is prevalent within the Lynn community. Safe, secure SROs are needed for homeless YYAs.
- Lynn's large population of at-risk youth need access to comprehensive youth development
 programs including, but not limited to, educational support (after-school and summer tutoring),
 mentoring, career exploration, teen summer jobs, nutrition and health care, HIV prevention,
 violence and substance abuse prevention, recreational and cultural support, teen pregnancy
 prevention, and gang prevention. Programs to facilitate in home learning and expand access to

- fast internet service have become increasingly important as schools closed in response to the pandemic.
- This population also needs more opportunities for employment, and the opportunities need to be for a livable wage. This should include job training, coaching, and mentorship programs, as many young adults lack the skills needed. Homeless YYA also need assistance with resume building and other foundational job-seeking skills.
- Homeless YYAs are in need of more accessible healthcare and mental health services. There is a need for client-centered education on healthcare topics, and healthcare/mental health supports for issues that may be caused or exacerbated by homelessness/housing instability.
- There is also a need to establish more coordination and streamlined communication between youth serving agencies, including the Department of Children and Families (DCF) and the Department of Youth Service (DYS) to ensure for smoother transitions between agencies and less service supplantation.
- There is a need to improve upon or create new systems to better identify and track homeless YYAs, and create better systems for tracking early identification factors that may lead to homelessness. This could allow for earlier interventions and more effective housing stabilization prior to the occurrence of homelessness.
- There is a need for more engagement with individuals who have lived experience and can advocate for the needs that they identify. The presence of those with lived experience may make those in need of services more likely to seek them out from systems that can seem overwhelming and complex.

Households that Speak a Language other than English at Home

For households that speak a language other than English at home, needs include, but are not limited to, education, job training, health care and other supportive services in a culturally sensitive and appropriate manner. These include GED preparation, Adult Basic Education (ABE), and English as a Second Language (ESL).

Female Heads of Households

Families headed by women are at increased risk of economic insecurity and homelessness. Among their needs are rental assistance, home repair assistance (for homeowners), accessible childcare, access to public transportation, safe recreational space for children, job training, and financial literacy training.

iii. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

According to Amirah, the most requested resource by those exiting human trafficking situations is secure, subsidized housing. Multiple studies, including survivors and service providers, have shown the critical role housing plays in a survivor's ability to exit trafficking situations and remain permanently independent. As a starting point for effective housing for this population, Amirah recommends creating a plan for 50 people:

 The best emergency housing option would be for themselves only in an efficiency apartment outside the area where their trafficking happened, in a building with other women in recovery, that is fully subsidized for 6 months. This would provide respite, case management and support from peer mentors who can help them develop resiliency against trafficking and opportunities to stabilize and progress.

- From there, with community support and oversight, women could transition into a 2 year, partially subsidized apartment, where they secure part time employment, enroll in school and maintain their sobriety. If they reach these objectives they could then qualify for:
- Another 2.5 yrs. of partially subsidized permanent housing that provides time to move from part time to full time employment that pays a living wage, leading to complete independence. This comprehensive 5-year plan could provide a proven path to sustained independence and recovery.

Among the many services needed for victims of domestic violence and their families are access to emergency services and shelter, mental health counseling, support groups, legal advocacy, children's programs, outreach programs, and permanent housing. According to HAWC, the following steps are needed to reduce homelessness and improve access to safety for survivors of domestic abuse:

- Support and partner with HAWC to collect data regarding survivors' housing needs.
- Offer training to organizations like HAWC so that better support can be provided to survivors of domestic abuse in seeking housing.
- Increase and improve case management support for individuals applying for housing benefits in Lynn.
- Support legislation and community partners advocating for employers to pay livable wages and address pay inequity for women and women of color.
- Support legislation and community partners advocating for high quality, affordable or free childcare.
- Advocate to increase the supply of affordable housing in Lynn.
- Ensure that survivors can establish eligibility for domestic violence priority and housing via self-certification; OR written statement signed by a victim services provider, medical professional, or an attorney; OR police record; OR court record.
- Provide designated scattered housing units for domestic violence survivors.
- iv. Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

As previously noted, this very large population group shares similar characteristics of the at-risk population. They also have similar needs including, but not limited to, the need for stable affordable housing. See also "at risk" discussion above.

E. Gaps

Identify any gaps within the current shelter and housing inventory as well as the service delivery system.

The gaps within the current shelter and housing inventory and service delivery system include those discussed in Section D above. The most significant gap is the lack of available affordable housing - the limited number of units available to low-income renters make it challenging for people in the qualifying populations to find and maintain housing.

As discussed below, the need for affordable housing among Lynn households, including housing for residents with mobility issues, is much larger than the supply. Lynn has 4,307 subsidized units with deed restrictions, representing approximately 12.06% of housing inventory. Units are targeted for low-income

households with income less than 80% of AMI, with the vast majority targeted to very low and extremely low-income households with income less than 50% of AMI. In addition, approximately 3,648 households receive rental assistance through federal or state vouchers administered by LHAND or other public housing authorities. The supply of affordable housing is at risk, i.e. the Community Economic Development Assistance Corporation estimates that 637 units in Lynn are at risk in 2022 although the City and LHAND continue to work aggressively with project owners and sponsors to identify and implement measures to preserve long-term affordability of expiring use units.

Data on households experiencing severe cost burdens and overcrowding points to the lack of sufficient affordable housing to meet the needs of the population. Among low-income renters, 24% are cost burdened and 27% are severely cost burdened (CHAS 2007-16). There are over 21,241 low-income households on LHAND waiting lists. This does not include waiting list data for other subsidized housing developments or for residents who have not applied for subsidized housing.

F. Additional characteristics

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability," as established in the HOME-ARP Notice. If including these characteristics, identify them here.

Not applicable.

G. Identify priority needs for qualifying populations:

In summary, based on the needs and gaps information presented above, the highest priority needs for HOME-ARP funding are those which apply across the board to all of the qualifying populations including:

- Permanent affordable housing of various types and configurations that responds to the broad range of needs of the families and individuals who are part of the HOME-ARP qualifying populations. This includes the need for SRO housing, Permanent Supportive Housing, elderly and family units, and accessible units for people with disabilities. In working to expand the supply of affordable housing, the City and LHAND continue to help build the capacity of non-profits and other community based organizations to engage in housing development activities.
- Tenant-based rental assistance to provide subsidies for tenants with substantial rent burdens.
- Supportive services that address a broad array of needs of one or more qualifying populations including case management, housing counseling, homelessness prevention, job training, employment, health care, substance abuse services and many others. As discussed above, the priority needs for supportive services vary to some degree among the qualifying population groups.

H. Determination of the level of need and gaps Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:

See narrative discussion above. The level of need and gaps in the shelter and housing inventory and service delivery systems was determined based on the community consultation described herein and input from multiple sources including homeless and domestic violence service providers; veterans' providers; LHAND staff; DCD and other local government staff; other public agencies that address the needs of the qualifying populations; public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities; and others. Comments on the Lynn Consolidated Plan for Fiscal Years 2020-2024 dated July 2021, which were submitted by the CoC were also considered in determining the level of needs and gaps.

V. HOME-ARP Activities

A. Application solicitation method(s)

Describe the method(s)that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors.

Projects proposed for HOME-ARP funding allocated to production of affordable rental housing and supportive services will be solicited through competitive processes overseen by the Lynn Housing Authority and Neighborhood Development (LHAND) using the Request for Proposals (RFP) method. Separate RFPs will be issued for the production of affordable rental housing and for supportive services. Leveraging of additional resources to support HOME-ARP activities will be strongly encouraged and the amount, source and commitment status of such leveraging will be considered during the proposal evaluation process.

Requests for Proposals will incorporate minimum requirements for recipients of funding including:

- Provide assurances that they will fully comply with requirements for use of HOME-ARP funds as specified in CPD-21-10, or successor HUD documents, and other published program requirements including those related to serving HOME-ARP eligible populations.
- Demonstrate prior successful experience implementing similar activities and the capacity to effectively plan, manage and implement the proposed activities.
- Demonstrate organizational capacity with respect to regulatory compliance, financial operations, performance tracking and reporting sufficient to meet the requirements of the HOME-ARP program.

LHAND will administer HOME-ARP funded Tenant-Based Rental Assistance (TBRA). LHAND will establish a waiting list for TBRA applicants for which all qualifying populations will be eligible to apply.

B. Describe whether the PJ will administer eligible activities directly.

The City of Lynn will not directly administer HOME-ARP funded activities. See below for discussion of roles and responsibilities of LHAND.

C. Subrecipient or contractor

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program.

The City of Lynn through the Lynn Department of Community Development (DCD) is the grantee for HOME-ARP and other formula grant programs including CDBG, HOME, and ESG. Planning and administration of all HOME-ARP activities is the responsibility of the Lynn Housing Authority and Neighborhood Development (LHAND). LHAND, as a sub-recipient of the City, directly administers and provides oversight and monitoring for other sub-recipients of HOME-ARP funding as well as for housing programs funded through CDBG, HOME and ESG. Lynn DCD and LHAND negotiate formal, performance-based contracts with all sub-recipients.

D. Use of HOME-ARP Funding

Table 13 describes the planned allocation of HOME-ARP funds by category.

Table 13 – Use of HOME-ARP Funding

	Funding Amount	Percent of Grant	Statutory Limit
Supportive Services	\$ 150,000		
Acquisition and Development of Non-Congregate Shelters			
Tenant-Based Rental Assistance (TBRA)	\$ 600,000		
Development of Affordable Rental Housing	\$2,000,000		
Non-Profit Operating			5%
Non-Profit Capacity Building	\$ 100,000	2.9%	5%
Administration and Planning	\$ 497,845	14.8%	15%
Total HOME ARP Allocation	\$3,347,845		

E. Distribution of HOME-ARP funds

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis.

Based on the priority needs identified above:

- The Plan allocates \$2,000,000 for the development of affordable rental housing, with project(s) selected using the RFP method. In accordance with HUD CPD-21-10, HOME-ARP funds may be used for acquisition, construction, and rehabilitation, including reconstruction as defined in 24 CFR 92.2 of affordable housing for qualifying and low-income housing. Only the eligible costs of HOME-ARP units may be charged to the HOME-ARP program. HOME-ARP funds are projected to pay for only a portion of the rental housing development costs, and will leverage other resources which may include Low Income Housing Tax Credits, state funds, HOME funds and other funds.
- The Plan allocates \$600,000 for TBRA to be administered in accordance with HUD CPD-21-10 by LHAND with a waiting list established for which all qualifying populations may apply. Under program rules, TBRA funds may be used for rental assistance, security deposits and/or utility deposits. HOME-ARP TBRA assisted households may choose to rent a unit in a HOME-ARP rental project or any other eligible unit.
- The Plan allocates \$150,0000 for supportive services to provide eligible services for qualifying populations. Project(s) will be selected using the RFP method. Only supportive services activities

and costs that are eligible under HOME-ARP will be funded, i.e. services that fall under one or more of the three categories defined in HUD CPD-21-10 (McKinney Vento Supportive Services, Homelessness Prevention Services, Housing Counseling Services).

- The Plan allocates \$100,000 for developing the capacity of eligible non-profit organizations to successfully carry out HOME-ARP activities. In accordance with HUD CPD-21-10, capacity building expenses are limited to the greater of 50% of the general operating expenses of an organization for that fiscal year or \$50,000. These funds will be allocated as part of the RFP processes for affordable rental housing development and supportive services.
- The Plan allocates approximately 15% of the grant amount for allowable HOME-ARP administration and planning activities undertaken by the City and LHAND.

F. Characteristics of shelter and housing inventory Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities.

The Allocation Plan funding priorities directly respond to community needs after careful consideration of current resources and inventory. The discussion above of the City's shelter and housing inventory, service delivery system and the needs/gaps analysis confirms the enormous unmet need for affordable housing and supportive services among the HOME-ARP qualifying populations and provides a solid rationale for the proposed funding priorities by category. With respect to affordable housing, there is a fundamental disconnect between the supply of affordable housing and the number of households who are homeless, at risk of homelessness or who are severely cost burdened. Given the cumulative size of the qualifying populations, HOME-ARP funding — while critically important and valuable — represents only a small fraction of the resources needed to address all of the documented housing and supportive service needs.

VI. HOME-ARP Production Housing Goals

A. Number of affordable rental housing units Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation.

The City estimates that approximately 50 units of affordable rental housing for qualifying populations will be produced or supported with HOME-ARP funds. As the cost of developing rental housing in the Lynn area greatly exceeds the HOME-ARP budget, leveraging other funds will be required.

B. Affordable rental housing production goal
Describe the specific affordable rental housing production goal that the PJ hopes to achieve
and describe how the production goal will address the PJ's priority needs.

The highest priority need identified during the consultation process and on an ongoing basis is the production of additional affordable rental housing to serve all of the qualifying population groups. The City estimates that approximately 50 units of affordable rental housing for qualifying populations will be produced or supported with HOME-ARP funds. As noted, a Request for Proposals process will be used to select projects for funding, and this RFP will strongly encourage projects that leverage other funding. It is anticipated that selected projects will leverage Low Income Tax Credits, other HOME or Housing Trust Funds, and/or other available funding sources.

VII. Preferences

A. Preference to populations

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

The City does not intend to limit eligibility or to give preference to a specific qualifying population.

B. Use of preference or method of prioritization

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis.

Not applicable as preferences will not be utilized. A wait list that is open for all qualified population groups will be established for each project or activity funded through HOME-ARP.

C. Referral methods

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional).

A wait list will be established for each project or activity funded through HOME-ARP.

D. Coordinated Entry (CE) process - populations

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional).

Not applicable.

E. CE process method of prioritization

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional).

Not applicable.

F. Prioritization between two referral methods

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional).

Not applicable.

G. Limit on eligibility

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice.

The City does not intend to limit eligibility for a HOME-ARP rental housing project to a particular qualifying population or subpopulation.

H. Necessity of limitation

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis.

Not applicable.

I. Unmet needs or gaps of other populations

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities).

Not applicable.

VIII. HOME-ARP Refinancing Guidelines

Not applicable. The City does not intend to use HOME-ARP funds to refinance existing debt secured be multifamily rental housing that is being rehabilitated with HOME-ARP funds.